

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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| LAURA CICCARELLO, Individually and on | : | Civil Action No. 1:20-cv-09568-GBD |
| Behalf of All Others Similarly Situated, | : | |
| | : | <u>CLASS ACTION</u> |
| Plaintiff, | : | |
| | : | |
| vs. | : | |
| | : | |
| ALIBABA GROUP HOLDING LIMITED, | : | |
| DANIEL ZHANG, and MAGGIE WU, | : | |
| | : | |
| Defendants. | : | |
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| ROBERT ROMNEK, Individually and on | : | Civil Action No. 1:20-cv-10267-GBD |
| Behalf of All Others Similarly Situated, | : | |
| | : | <u>CLASS ACTION</u> |
| Plaintiff, | : | |
| | : | |
| vs. | : | |
| | : | |
| ALIBABA GROUP HOLDING LIMITED, | : | |
| DANIEL ZHANG, and MAGGIE WU, | : | |
| | : | |
| Defendants. | : | |
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[Caption continued on following page.]

NOTICE OF MOTION FOR CONSOLIDATION OF RELATED ACTIONS, APPOINTMENT
AS LEAD PLAINTIFF, AND APPROVAL OF LEAD PLAINTIFF'S SELECTION OF LEAD
COUNSEL

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| ELISSA HESS, AS TRUSTEE FOR THE EH | : | Civil Action No. 1:21-cv-00136-UA |
| LIVING TRUST, Individually and on Behalf | : | |
| of All Others Similarly Situated, | : | <u>CLASS ACTION</u> |
| | : | |
| Plaintiff, | : | |
| | : | |
| vs. | : | |
| | : | |
| ALIBABA GROUP HOLDING LIMITED, | : | |
| DANIEL ZHANG and MAGGIE WU, | : | |
| | : | |
| Defendants. | : | |
| | : | |
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TO: ALL PARTIES AND THEIR COUNSEL OF RECORD

PLEASE TAKE NOTICE that class member and proposed lead plaintiff 1199 SEIU Health Care Employees Pension Fund (the “Pension Fund”) will move this Court, on a date and at such time as may be designated by the Court, in Courtroom 11A of the Daniel Patrick Moynihan United States Courthouse, 500 Pearl St., New York, New York 10007, for an order: (1) consolidating the above-captioned related securities class actions; (2) appointing the Pension Fund as Lead Plaintiff pursuant to the Private Securities Litigation Reform Act of 1995, 15 U.S.C. §78u-4, *et seq.*; and (3) approving its selection of Robbins Geller Rudman & Dowd LLP as Lead Counsel for the proposed class. In support of this Motion, the Pension Fund submits the accompanying Memorandum of Law, the Declaration of David A. Rosenfeld, and a [Proposed] Order.

DATED: January 12, 2021

ROBBINS GELLER RUDMAN
& DOWD LLP
SAMUEL H. RUDMAN
DAVID A. ROSENFELD

s/ David A. Rosenfeld
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[Proposed] Lead Counsel for [Proposed] Lead
Plaintiff

CERTIFICATE OF SERVICE

I hereby certify under penalty of perjury that on January 12, 2021, I authorized the electronic filing of the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the e-mail addresses on the attached Electronic Mail Notice List, and I hereby certify that I caused the mailing of the foregoing via the United States Postal Service to the non-CM/ECF participants indicated on the attached Manual Notice List.

s/ David A. Rosenfeld

DAVID A. ROSENFELD

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Mailing Information for a Case 1:20-cv-09568-GBD Ciccarello v. Alibaba Group Holding Limited et al

Electronic Mail Notice List

The following are those who are currently on the list to receive e-mail notices for this case.

- **Frederic Scott Fox , Sr**
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- **Jeremy Alan Lieberman**
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- **Gregory Bradley Linkh**
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Manual Notice List

The following is the list of attorneys who are **not** on the list to receive e-mail notices for this case (who therefore require manual noticing). You may wish to use your mouse to select and copy this list into your word processing program in order to create notices or labels for these recipients.

- (No manual recipients)